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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF PATRICK
SCHMIDT IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
LETTER BRIEF IN SUPPORT OF ITS
MOTION TO COMPEL FORENSIC
IMAGES AND OTHER MATERIALS
PROVIDED BY THE DILIGENCED
EMPLOYEES TO STROZ FRIEDBERG**

I, Patrick Schmidt, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Its Letter Brief in Support of its Motion to Compel forensic images and other materials provided by the Diligenced Employees to Stroz Friedberg (“Letter Brief”) (“Administrative Motion”).

3. The Administrative Motion to File Under Seal seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief	Highlighted in Blue	Defendants
Exhibits 1-3	Entire Documents	Defendants and Third Parties Bismuth, Sandstone, and Levandowski

4. Waymo only seeks to seal the information set forth above because Waymo believes such information is considered confidential or non-public by Defendants and/or certain third parties. Waymo expects one or more of the Defendants to make a motion to support sealing this additional information.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in Los Angeles, California, on September 24, 2017.

By /s/ Patrick Schmidt

Patrick Schmidt
Attorney for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Patrick Schmidt.

/s/ Charles K. Verhoeven
Charles K. Verhoeven